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7 | Attorneys for Defendant
Virtual Barcode Distribution LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

12 | AXS GROUP LLC,

Case No.: 2:24-cv-00377-SPG-(Ex)

Plaintiff,

**DEFENDANT VIRTUAL BARCODE
DISTRIBUTION LLC'S ANSWER
TO PLAINTIFF'S SECOND
AMENDED COMPLAINT**

VS

JURY TRIAL DEMANDED

16 EVENT TICKETS CENTER, INC.,
17 TICKETNETWROK, INC., VIRTUAL
18 BARCODE DISTRIBUTION LLC;
19 ALTAN TANRIVERDI; AND
20 SECURE TICKETS.

Honorable Sherilyn Peace Garnett

Defendants

Complaint served: December 9, 2024
Current response date: January 30, 2025

Defendant VIRTUAL BARCODE DISTRIBUTION LLC (“VBD”) hereby respond to Plaintiff AXS GROUP LLC’s (“AXS” or “Plaintiff”) Second Amended Complaint (“SAC”) as follows:

ANSWER

Defendant VIRTUAL BARCODE DISTRIBUTION LLC (“Defendant” or “VBD”) hereby answers the Complaint of Plaintiff AXS GROUP LLC, as follows:

I. INTRODUCTION & SUMMARY OF RELIEF REQUESTED

1. Paragraph 1, VBD denies each and every allegation contained therein as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to the truth of all remaining allegations, further they consist of conclusions of law and/or statements of Plaintiff’s position to which no response is required by Defendant VBD; to the extent a response is required, denied.

2. Paragraph 2, Defendant VBD lacks information sufficient to form a belief as to the truth of said allegations, further the allegations consist of conclusions of law and/or statements of Plaintiff’s position to which no response is required; to the extent a response is required, denied.

3. Paragraph 3 Defendant VBD lacks information sufficient to form a belief as to the truth of said allegations, further the allegations consist of conclusions of law and/or statements of Plaintiff’s position to which no response is required; to the extent a response is required, denied.

4. Paragraph 4 Defendant VBD lacks information sufficient to form a belief as to the truth of said allegations, further the allegations consist of conclusions of law and/or statements of Plaintiff’s position to which no response is required; to the extent a response is required, denied.

5. Paragraph 5 Defendant VBD lacks information sufficient to form a belief as to the truth of said allegations, further the allegations consist of conclusions of law and/or statements of Plaintiff’s position to which no response is required; to the extent a response is required, denied.

6. Paragraph 6 Defendant VBD lacks information sufficient to form a belief as to

1 the truth of said allegations, further the allegations consist of conclusions of law
2 and/or statements of Plaintiff's position to which no response is required; to the
3 extent a response is required, denied.

4 7. Paragraph 7 VBD denies each and every allegation contained therein as it
5 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
6 the truth of all remaining allegations, further the allegations consist of conclusions of
7 law and/or statements of Plaintiff's position to which no response is required; to the
8 extent a response is required, denied.

9 8. Paragraph 8 VBD denies each and every allegation contained therein as it
10 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
11 the truth of all remaining allegations, further the allegations consist of conclusions of
12 law and/or statements of Plaintiff's position to which no response is required; to the
13 extent a response is required, denied.

14 9. Paragraph 9 VBD denies each and every allegation contained therein as it
15 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
16 the truth of all remaining allegations, further the allegations consist of conclusions of
17 law and/or statements of Plaintiff's position to which no response is required; to the
18 extent a response is required, denied.

19

20 **II. PARTIES**

21 10. Paragraph 10 Defendant VBD lacks information sufficient to form a belief as
22 to the truth of said allegations, further the allegations consist of conclusions of law
23 and/or statements of Plaintiff's position to which no response is required; to the
24 extent a response is required, denied.

25 11. Paragraph 11 Defendant VBD lacks information sufficient to form a belief as

1 to the truth of said allegations, further the allegations consist of conclusions of law
2 and/or statements of Plaintiff's position to which no response is required; to the
3 extent a response is required, denied.

4 12. Paragraph 12 Defendant VBD lacks information sufficient to form a belief as
5 to the truth of said allegations, further the allegations consist of conclusions of law
6 and/or statements of Plaintiff's position to which no response is required; to the
7 extent a response is required, denied.

8 13. Paragraph 13 VBD admits it is a limited liability company organized under the
9 laws of the State of New York. VBD admits it registered the verified-ticket.com
10 domain. VBD denies all remaining allegations contained in Paragraph 13.

11 14. Paragraph 14 Defendant VBD lacks information sufficient to form a belief as
12 to the truth of said allegations, further the allegations consist of conclusions of law
13 and/or statements of Plaintiff's position to which no response is required; to the
14 extent a response is required, denied.

15 15. Paragraph 15 Defendant VBD lacks information sufficient to form a belief as
16 to the truth of said allegations, further the allegations consist of conclusions of law
17 and/or statements of Plaintiff's position to which no response is required; to the
18 extent a response is required, denied.

19 16. Paragraph 16 Defendant VBD lacks information sufficient to form a belief as
20 to the truth of said allegations, further the allegations consist of conclusions of law
21 and/or statements of Plaintiff's position to which no response is required; to the
22 extent a response is required, denied.

23 **III. JURISDICTION AND VENUE**

24 17. Paragraph 17, Defendant VBD admits subject matter jurisdiction is proper.
25 VBD denies all remaining allegation contained in Paragraph 17.

26 18. Paragraph 18, Defendant VBD admits supplement jurisdiction is proper, but

1 denies all other allegations of this Paragraph. VBD denies all remaining allegation
2 contained in Paragraph 18.

3 19. Paragraph 19 Defendant VBD admits personal jurisdiction is proper, but denies
4 all other allegations of this Paragraph. VBD denies all remaining allegation
5 contained in Paragraph 18.

6 20. To extent Paragraph 20 pertains to VBD, VBD denies that it has committed
7 any alleged wrongdoing as described in the SAC. As it may pertain to any other
8 Defendant, VBD lacks knowledge or information sufficient to form a belief as to the
9 truth of the allegations in Paragraph 20, and on that basis denies them.

10 21. Paragraph 21 Defendant VBD lacks information sufficient to form a belief as
11 to the truth of said allegations, further the allegations consist of conclusions of law
12 and/or statements of Plaintiff's position to which no response is required; to the
13 extent a response is required, denied.

14 22. Paragraph 22 Defendant VBD admits venue is proper, but denies all other
15 allegations of this Paragraph.

16 **IV. PLAINTIFF'S E-TICKETING BUSINESS OPERATION**

17 23. Paragraph 23 Defendant VBD lacks information sufficient to form a belief as
18 to the truth of said allegations, further the allegations consist of conclusions of law
19 and/or statements of Plaintiff's position to which no response is required; to the
20 extent a response is required, denied.

21 24. Paragraph 24 Defendant VBD lacks information sufficient to form a belief as
22 to the truth of said allegations, further the allegations consist of conclusions of law
23 and/or statements of Plaintiff's position to which no response is required; to the
24 extent a response is required, denied.

25 25. Paragraph 25 Defendant VBD lacks information sufficient to form a belief as

1 to the truth of said allegations, further the allegations consist of conclusions of law
2 and/or statements of Plaintiff's position to which no response is required; to the
3 extent a response is required, denied.

4 26. Paragraph 26 Defendant VBD lacks information sufficient to form a belief as
5 to the truth of said allegations, further the allegations consist of conclusions of law
6 and/or statements of Plaintiff's position to which no response is required; to the
7 extent a response is required, denied.

8 27. Paragraph 27 Defendant VBD lacks information sufficient to form a belief as
9 to the truth of said allegations, further the allegations consist of conclusions of law
10 and/or statements of Plaintiff's position to which no response is required; to the
11 extent a response is required, denied.

12 B. AXS Mobile ID Technology (Formerly Known as “Flash Seats”)

13 28. Paragraph 28 Defendant VBD lacks information sufficient to form a belief as
14 to the truth of said allegations, further the allegations consist of conclusions of law
15 and/or statements of Plaintiff's position to which no response is required; to the
16 extent a response is required, denied.

17 29. Paragraph 29 Defendant VBD lacks information sufficient to form a belief as
18 to the truth of said allegations, further the allegations consist of conclusions of law
19 and/or statements of Plaintiff's position to which no response is required; to the
20 extent a response is required, denied.

21 30. Paragraph 30 Defendant VBD lacks information sufficient to form a belief as
22 to the truth of said allegations, further the allegations consist of conclusions of law
23 and/or statements of Plaintiff's position to which no response is required; to the
24 extent a response is required, denied.

25 31. Paragraph 31 Defendant VBD lacks information sufficient to form a belief as

1 to the truth of said allegations, further the allegations consist of conclusions of law
2 and/or statements of Plaintiff's position to which no response is required; to the
3 extent a response is required, denied.

4 32. Paragraph 32 Defendant VBD lacks information sufficient to form a belief as
5 to the truth of said allegations, further the allegations consist of conclusions of law
6 and/or statements of Plaintiff's position to which no response is required; to the
7 extent a response is required, denied.

8 33. Paragraph 33 Defendant VBD lacks information sufficient to form a belief as
9 to the truth of said allegations, further the allegations consist of conclusions of law
10 and/or statements of Plaintiff's position to which no response is required; to the
11 extent a response is required, denied.

12 34. Paragraph 34 Defendant VBD lacks information sufficient to form a belief as
13 to the truth of said allegations, further the allegations consist of conclusions of law
14 and/or statements of Plaintiff's position to which no response is required; to the
15 extent a response is required, denied.

16 35. Paragraph 35 Defendant VBD lacks information sufficient to form a belief as
17 to the truth of said allegations, further the allegations consist of conclusions of law
18 and/or statements of Plaintiff's position to which no response is required; to the
19 extent a response is required, denied

20 **V. PLAINTIFF'S [ALLEGEDLY]VALID AND SUBSISTING
21 INTELLECTUAL PROPERTY RIGHTS**

22 **A. THE AXS Trademarks**

23 36. Paragraph 36 Defendant VBD lacks information sufficient to form a belief as
24 to the truth of said allegations, further the allegations consist of conclusions of law
25 and/or statements of Plaintiff's position to which no response is required; to the
26 extent a response is required, denied.

27 37. Paragraph 37 Defendant VBD lacks information sufficient to form a belief as

1 to the truth of said allegations, further the allegations consist of conclusions of law
2 and/or statements of Plaintiff's position to which no response is required; to the
3 extent a response is required, denied.

4 Paragraph 38 Defendant VBD lacks information sufficient to form a belief as
5 to the truth of said allegations, further the allegations consist of conclusions of law
6 and/or statements of Plaintiff's position to which no response is required; to the
7 extent a response is required, denied.

8 Paragraph 39 Defendant VBD lacks information sufficient to form a belief as
9 to the truth of said allegations, further the allegations consist of conclusions of law
10 and/or statements of Plaintiff's position to which no response is required; to the
11 extent a response is required, denied.

12 Paragraph 40, Defendant VBD admits Plaintiff is listed as the owner of the
13 trademarks United States Patent and Trademark Office identified in Paragraph 40. As
14 to all other allegations, VBD lacks information sufficient to form a belief as to the
15 truth of said allegations, further the allegations consist of conclusions of law and/or
16 statements of Plaintiff's position to which no response is required; to the extent a
17 response is required, Defendant is without information and knowledge sufficient to
18 form a belief as to the truth or falsity of the statements made in Paragraph 40, and
19 therefore denies them.

20 Paragraph 41 Defendant VBD admits Plaintiff is listed as the owner of the
21 trademarks in the United States Patent and Trademark Office identified in Exhibit H.
22 As to all other allegations, VBD lacks information sufficient to form a belief as to the
23 truth of said allegations, further the allegations consist of conclusions of law and/or
24 statements of Plaintiff's position to which no response is required; to the extent a
25 response is required, Defendant is without information and knowledge sufficient to
26 form a belief as to the truth or falsity of the statements made in Paragraph 41, and
27 therefore denies them.

1 42. Paragraph 42 Defendant VBD lacks information sufficient to form a belief as
2 to the truth of said allegations, further the allegations consist of conclusions of law
3 and/or statements of Plaintiff's position to which no response is required; to the
4 extent a response is required, denied.

5 43. Paragraph 43 Defendant VBD lacks information sufficient to form a belief as
6 to the truth of said allegations, further the allegations consist of conclusions of law
7 and/or statements of Plaintiff's position to which no response is required; to the
8 extent a response is required, denied.

9 **B. THE AXS Copyrights**

10 44. Paragraph 44 Defendant VBD admits Plaintiff is listed as the owner of the
11 copyrights in the United States Library of Congress. As to all other allegations, VBD
12 lacks information sufficient to form a belief as to the truth of said allegations, further
13 the allegations consist of conclusions of law and/or statements of Plaintiff's position
14 to which no response is required; to the extent a response is required, Defendant is
15 without information and knowledge sufficient to form a belief as to the truth or falsity
16 of the statements made in Paragraph 44, and therefore denies them.

17 45. Paragraph 45 Defendant VBD admits Plaintiff is listed as the owner of the
18 copyrights in the United States Library of Congress. As to all other allegations, VBD
19 lacks information sufficient to form a belief as to the truth of said allegations, further
20 the allegations consist of conclusions of law and/or statements of Plaintiff's position
21 to which no response is required; to the extent a response is required, Defendant is
22 without information and knowledge sufficient to form a belief as to the truth or falsity
23 of the statements made in Paragraph 45, and therefore denies them.

24 46. Paragraph 46 Defendant VBD admits Plaintiff is listed as the owner of the
25 copyrights in the United States Library of Congress. As to all other allegations, VBD
26 lacks information sufficient to form a belief as to the truth of said allegations, further
27 the allegations consist of conclusions of law and/or statements of Plaintiff's position

1 to which no response is required; to the extent a response is required, Defendant is
2 without information and knowledge sufficient to form a belief as to the truth or falsity
3 of the statements made in Paragraph 46, and therefore denies them.

4 47. Paragraph 47 consists of conclusions of law and/or statements of Plaintiff's
5 position to which no response is required; to the extent a response is required,
6 Defendant is without information and knowledge sufficient to form a belief as to the
7 truth or falsity of the statements made in Paragraph 47, and therefore denies them.

8 48. Paragraph 48 consists of conclusions of law and/or statements of Plaintiff's
9 position to which no response is required; to the extent a response is required,
10 Defendant is without information and knowledge sufficient to form a belief as to the
11 truth or falsity of the statements made in Paragraph 48, and therefore denies them.

12 **C. Notice of Plaintiff's Trademarks and Copyrights**

13 49. Defendant VBD lacks information sufficient to form a belief as to the truth of
14 said allegations, in Paragraph 49, and therefore denies them.

15 50. Defendant VBD lacks information sufficient to form a belief as to the truth of
16 said allegations, in Paragraph 50, and therefore denies them.

17 51. Defendant VBD lacks information sufficient to form a belief as to the truth of
18 said allegations, in Paragraph 51, and therefore denies them.

19 **VI. DEFENDANTS [ALLEGED] INFRINGING AND ILLICIT
20 COUNTERFEITING OPERATIONS**

21 52. Defendant VBD lacks information sufficient to form a belief as to the truth of
22 said allegations, in Paragraph 48, and therefore denies them.

23 53. Paragraph 53 VBD denies each and every allegation contained therein as it
24 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
25 the truth of all remaining allegations, further the allegations consist of conclusions of
26 law and/or statements of Plaintiff's position to which no response is required; to the
27 extent a response is required, denied.

1 **A. ETC [Allegedly] Delivers Counterfeit AXS Digital Tickets to**
2 **Unsuspecting Consumer in Cooperation with VBD.**

3 54. Defendant VBD lacks information sufficient to form a belief as to the truth of
4 said allegations, in Paragraph 54, and therefore denies them.

5 55. Defendant VBD lacks information sufficient to form a belief as to the truth of
6 said allegations, in Paragraph 55, and therefore denies them.

7 56. Defendant VBD lacks information sufficient to form a belief as to the truth of
8 said allegations, in Paragraph 56, and therefore denies them.

9 57. VBD denies each and every allegation contained in Paragraph 57.

10 58. VBD denies each and every allegation contained in Paragraph 58.

11 59. VBD denies each and every allegation contained in Paragraph 59.

12 60. VBD denies each and every allegation contained in Paragraph 60.

13 61. VBD denies each and every allegation contained in Paragraph 61.

14 62. VBD denies each and every allegation contained in Paragraph 62.

15 63. VBD denies each and every allegation contained in Paragraph 63.

16 64. VBD denies each and every allegation contained in Paragraph 64.

17 65. VBD denies each and every allegation contained in Paragraph 65.

18 **B. TNI Markets and Delivers Counterfeits AXS Digital Tickets to**
19 **Unsuspecting Consumers and Provides Software to Facilitate the**
20 **Same**

21 66. Defendant VBD lacks information sufficient to form a belief as to the truth of
22 said allegations, in Paragraph 66, and therefore denies them.

23 67. Defendant VBD lacks information sufficient to form a belief as to the truth of
24 said allegations, in Paragraph 67, and therefore denies them.

25 68. Defendant VBD lacks information sufficient to form a belief as to the truth of
26 said allegations, in Paragraph 68, and therefore denies them.

27 69. Defendant VBD lacks information sufficient to form a belief as to the truth of

1 said allegations, in Paragraph 69, and therefore denies them.

2 70.Defendant VBD lacks information sufficient to form a belief as to the truth of
3 said allegations, in Paragraph 70, and therefore denies them.

4 71.Defendant VBD lacks information sufficient to form a belief as to the truth of
5 said allegations, in Paragraph 71, and therefore denies them.

6 72.Defendant VBD lacks information sufficient to form a belief as to the truth of
7 said allegations, in Paragraph 72, and therefore denies them.

8 73.Defendant VBD lacks information sufficient to form a belief as to the truth of
9 said allegations, in Paragraph 73, and therefore denies them.

10 74.Defendant VBD lacks information sufficient to form a belief as to the truth of
11 said allegations, in Paragraph 74, and therefore denies them.

12 75.Defendant VBD lacks information sufficient to form a belief as to the truth of
13 said allegations, in Paragraph 75, and therefore denies them.

14 76.Defendant VBD lacks information sufficient to form a belief as to the truth of
15 said allegations, in Paragraph 76, and therefore denies them.

16 77.Defendant VBD lacks information sufficient to form a belief as to the truth of
17 said allegations, in Paragraph 77, and therefore denies them.

18 78.Defendant VBD lacks information sufficient to form a belief as to the truth of
19 said allegations, in Paragraph 78, and therefore denies them.

20 79.Defendant VBD lacks information sufficient to form a belief as to the truth of
21 said allegations, in Paragraph 79, and therefore denies them.

22 80.Defendant VBD lacks information sufficient to form a belief as to the truth of
23 said allegations, in Paragraph 80, and therefore denies them.

24 **C. ETC's Independent Acts of infringement and Unfair Competition**

25 81. Defendant VBD lacks information sufficient to form a belief as to the truth of
26 said allegations, in Paragraph 54, and therefore denies them.

27 82.Defendant VBD lacks information sufficient to form a belief as to the truth of

1 said allegations, in Paragraph 82, and therefore denies them.

2 83.Defendant VBD lacks information sufficient to form a belief as to the truth of
3 said allegations, in Paragraph 83, and therefore denies them.

4 84.Defendant VBD lacks information sufficient to form a belief as to the truth of
5 said allegations, in Paragraph 84, and therefore denies them.

6 85.Defendant VBD lacks information sufficient to form a belief as to the truth of
7 said allegations, in Paragraph 85, and therefore denies them.

8 86.Defendant VBD lacks information sufficient to form a belief as to the truth of
9 said allegations, in Paragraph 86, and therefore denies them.

10 87.Defendant VBD lacks information sufficient to form a belief as to the truth of
11 said allegations, in Paragraph 87, and therefore denies them.

12 **D. Defendant Tanriverdi is Selling an Distributing Counterfeit AXS
13 Tickets in this Judicial District**

14 88. Defendant VBD lacks information sufficient to form a belief as to the truth of
15 said allegations, in Paragraph 88, and therefore denies them.

16 89.Defendant VBD lacks information sufficient to form a belief as to the truth of
17 said allegations, in Paragraph 89, and therefore denies them.

18 90.Defendant VBD lacks information sufficient to form a belief as to the truth of
19 said allegations, in Paragraph 90, and therefore denies them.

20 91.Defendant VBD lacks information sufficient to form a belief as to the truth of
21 said allegations, in Paragraph 91, and therefore denies them.

22 92.Defendant VBD lacks information sufficient to form a belief as to the truth of
23 said allegations, in Paragraph 92, and therefore denies them.

24 93.Defendant VBD lacks information sufficient to form a belief as to the truth of
25 said allegations, in Paragraph 93, and therefore denies them.

26 94.Defendant VBD lacks information sufficient to form a belief as to the truth of
27 said allegations, in Paragraph 94, and therefore denies them.
28

1 **E. Secure.Tickets is Selling and Distributing Counterfeit AXS**

2 **Tickets in this Judicial District**

3 95. Defendant VBD lacks information sufficient to form a belief as to the truth of
4 said allegations, in Paragraph 95, and therefore denies them.

5 96. Defendant VBD lacks information sufficient to form a belief as to the truth of
6 said allegations, in Paragraph 96, and therefore denies them.

7 97. Paragraph 97 VBD denies each and every allegation contained therein as it
8 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
9 the truth of all remaining allegations, further the allegations consist of conclusions of
10 law and/or statements of Plaintiff's position to which no response is required; to the
11 extent a response is required, denied.

12 98. Paragraph 98 VBD denies each and every allegation contained therein as it
13 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
14 the truth of all remaining allegations, further the allegations consist of conclusions of
15 law and/or statements of Plaintiff's position to which no response is required; to the
16 extent a response is required, denied.

17 99. Paragraph 99 VBD denies each and every allegation contained therein as it
18 pertains to Defendant VBD. VBD lacks information sufficient to form a belief as to
19 the truth of all remaining allegations, further the allegations consist of conclusions of
20 law and/or statements of Plaintiff's position to which no response is required; to the
21 extent a response is required, denied.

22 100. Paragraph 100 VBD denies each and every allegation contained therein
23 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
24 as to the truth of all remaining allegations, further the allegations consist of
25 conclusions of law and/or statements of Plaintiff's position to which no response is
26 required; to the extent a response is required, denied.

27 101. Paragraph 101 VBD denies each and every allegation contained therein

1 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
2 as to the truth of all remaining allegations, further the allegations consist of
3 conclusions of law and/or statements of Plaintiff's position to which no response is
4 required; to the extent a response is required, denied.

5 102. Paragraph 102 VBD denies each and every allegation contained therein
6 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
7 as to the truth of all remaining allegations, further the allegations consist of
8 conclusions of law and/or statements of Plaintiff's position to which no response is
9 required; to the extent a response is required, denied.

10 103. Paragraph 103 Defendant VBD lacks information sufficient to form a
11 belief as to the truth of said allegations, further the allegations consist of conclusions
12 of law and/or statements of Plaintiff's position to which no response is required; to
13 the extent a response is required, to the extent a response is required, denied.

14 104. Paragraph 104 Defendant VBD lacks information sufficient to form a
15 belief as to the truth of said allegations, further the allegations consist of conclusions
16 of law and/or statements of Plaintiff's position to which no response is required; to
17 the extent a response is required, to the extent a response is required, denied.

18 105. Paragraph 105 Defendant VBD lacks information sufficient to form a
19 belief as to the truth of said allegations, further the allegations consist of conclusions
20 of law and/or statements of Plaintiff's position to which no response is required; to
21 the extent a response is required, to the extent a response is required, denied.

22 106. Paragraph 106 Defendant VBD lacks information sufficient to form a
23 belief as to the truth of said allegations, further the allegations consist of conclusions
24 of law and/or statements of Plaintiff's position to which no response is required; to
25 the extent a response is required, to the extent a response is required, denied.

26 107. Paragraph 107 VBD denies each and every allegation contained therein

1 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
2 as to the truth of all remaining allegations, and therefore denies them.

3 108. Paragraph 108 VBD denies each and every allegation contained therein
4 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
5 as to the truth of all remaining allegations, and therefore denies them.

6 109. Paragraph 109 VBD denies each and every allegation contained therein
7 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
8 as to the truth of all remaining allegations, and therefore denies them.

9 110. Paragraph 110 VBD denies each and every allegation contained therein
10 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
11 as to the truth of all remaining allegations, and therefore denies them.

12 111. Paragraph 111 VBD denies each and every allegation contained therein
13 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
14 as to the truth of all remaining allegations, and therefore denies them.

15 112. Paragraph 112 VBD denies each and every allegation contained therein
16 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
17 as to the truth of all remaining allegations, and therefore denies them.

18 113. Paragraph 113 VBD denies each and every allegation contained therein
19 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
20 as to the truth of all remaining allegations, and therefore denies them.

21 114. Paragraph 114 VBD denies each and every allegation contained therein
22 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
23 as to the truth of all remaining allegations, and therefore denies them.

24 115. Paragraph 116 VBD denies each and every allegation contained therein
25 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
26 as to the truth of all remaining allegations, and therefore denies them.

27 116. Paragraph 117 VBD denies each and every allegation contained therein
28

1 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
2 as to the truth of all remaining allegations, and therefore denies them.

3 **Second Cause of Action (All Defendants) Violation of Digital Millennium
4 Copyright Act Under 17 U.S.C. §1201**

5 117. In response to Paragraph 117, VBD incorporates by reference its
6 responses to the proceeding paragraphs of the SAC as though fully restated herein.

7 118. Defendant VBD lacks information sufficient to form a belief as to the
8 truth of said allegations, in Paragraph 118, and therefore denies them.

9 119. Defendant VBD lacks information sufficient to form a belief as to the
10 truth of said allegations, in Paragraph 119, and therefore denies them.

11 120. Paragraph 120 VBD denies each and every allegation contained therein
12 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
13 as to the truth of all remaining allegations, and therefore denies them.

14 121. Paragraph 121 VBD denies each and every allegation contained therein
15 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
16 as to the truth of all remaining allegations, and therefore denies them.

17 122. Paragraph 122 VBD denies each and every allegation contained therein
18 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
19 as to the truth of all remaining allegations, and therefore denies them.

20 123. Paragraph 123 VBD denies each and every allegation contained therein
21 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
22 as to the truth of all remaining allegations, and therefore denies them.

23 124. Paragraph 124 VBD denies each and every allegation contained therein
24 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
25 as to the truth of all remaining allegations, and therefore denies them.

26 **Third Cause of Action (All Defendants) Trademark Counterfeiting Under 15
27 U.S.C. §1114 et seq.**

1 125. In response to Paragraph 125, VBD incorporates by reference its
2 responses to the proceeding paragraphs of the SAC as though fully restated herein.

3 126. Defendant VBD lacks information sufficient to form a belief as to the
4 truth of said allegations, in Paragraph 126, and therefore denies them.

5 127. Paragraph 127 VBD denies each and every allegation contained therein
6 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
7 as to the truth of all remaining allegations, and therefore denies them.

8 128. Paragraph 128 VBD denies each and every allegation contained therein
9 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
10 as to the truth of all remaining allegations, and therefore denies them.

11 129. Paragraph 129 VBD denies each and every allegation contained therein
12 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
13 as to the truth of all remaining allegations, and therefore denies them.

14 130. Paragraph 130 VBD denies each and every allegation contained therein
15 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
16 as to the truth of all remaining allegations, and therefore denies them.

17 131. Paragraph 131 VBD denies each and every allegation contained therein
18 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
19 as to the truth of all remaining allegations, and therefore denies them.

20 **Fourth Cause of Action (All Defendants) Trademark Infringement Under 15
21 U.S.C. § 1114, et seq.**

22 132. In response to Paragraph 132, VBD incorporates by reference its
23 responses to the proceeding paragraphs of the SAC as though fully restated herein.

24 133. Defendant VBD lacks information sufficient to form a belief as to the
25 truth of said allegations, in Paragraph 133, and therefore denies them.

26 | 134. Paragraph 134 VBD denies each and every allegation contained therein

1 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
2 as to the truth of all remaining allegations, and therefore denies them.

3 135. Paragraph 135 VBD denies each and every allegation contained therein
4 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
5 as to the truth of all remaining allegations, and therefore denies them.

6 136. Paragraph 136 VBD denies each and every allegation contained therein
7 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
8 as to the truth of all remaining allegations, and therefore denies them.

9 137. Paragraph 137 VBD denies each and every allegation contained therein
10 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
11 as to the truth of all remaining allegations, and therefore denies them.

12 138. Paragraph 138 VBD denies each and every allegation contained therein
13 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
14 as to the truth of all remaining allegations, and therefore denies them.

15 **Fifth Cause of Action (All Defendants) Unfair Competition and False
16 Designation of Origin Under 15 U.S.C. §1125, et seq.**

17 139. In response to Paragraph 139, VBD incorporates by reference its
18 responses to the proceeding paragraphs of the SAC as though fully restated herein.

19 140. Defendant VBD lacks information sufficient to form a belief as to the
20 truth of said allegations, in Paragraph 140, and therefore denies them.

21 141. Paragraph 141 VBD denies each and every allegation contained therein
22 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
23 as to the truth of all remaining allegations, and therefore denies them.

24 142. Paragraph 142 VBD denies each and every allegation contained therein
25 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
26 as to the truth of all remaining allegations, and therefore denies them.

27 143. Paragraph 143 VBD denies each and every allegation contained therein

1 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
2 as to the truth of all remaining allegations, and therefore denies them.

3 144. Paragraph 144 VBD denies each and every allegation contained therein
4 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
5 as to the truth of all remaining allegations, and therefore denies them.

6 145. Paragraph 145 VBD denies each and every allegation contained therein
7 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
8 as to the truth of all remaining allegations, and therefore denies them.

9 **Sixth Cause of Action (All Defendants) State Statutory Unfair
10 Competition Under Cal. Bus. & Prof. Code 17200, et seq.**

11 146. In response to Paragraph 146, VBD incorporates by reference its
12 responses to the proceeding paragraphs of the SAC as though fully restated herein.

13 147. Defendant VBD lacks information sufficient to form a belief as to the
14 truth of said allegations, in Paragraph 147, and therefore denies them.

15 148. Paragraph 148 VBD denies each and every allegation contained therein
16 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
17 as to the truth of all remaining allegations, and therefore denies them.

18 149. Paragraph 149 VBD denies each and every allegation contained therein
19 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
20 as to the truth of all remaining allegations, and therefore denies them.

21 150. Paragraph 150 VBD denies each and every allegation contained therein
22 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
23 as to the truth of all remaining allegations, and therefore denies them.

24 151. Paragraph 151 VBD denies each and every allegation contained therein
25 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
26 as to the truth of all remaining allegations, and therefore denies them.

1 **Seventh Cause of Action (All Defendants) Common Law False Designation of**
2 **Origin & Unfair Competition**

3 152. In response to Paragraph 152, VBD incorporates by reference its
4 responses to the proceeding paragraphs of the SAC as though fully restated herein.

5 153. Defendant VBD lacks information sufficient to form a belief as to the
6 truth of said allegations, in Paragraph 153, and therefore denies them.

7 154. Paragraph 154 VBD denies each and every allegation contained therein
8 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
9 as to the truth of all remaining allegations, and therefore denies them.

10 155. Paragraph 155 VBD denies each and every allegation contained therein
11 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
12 as to the truth of all remaining allegations, and therefore denies them.

13 156. Paragraph 156 VBD denies each and every allegation contained therein
14 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
15 as to the truth of all remaining allegations, and therefore denies them.

16 157. Paragraph 157 VBD denies each and every allegation contained therein
17 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
18 as to the truth of all remaining allegations, and therefore denies them.

19 158. Paragraph 158 VBD denies each and every allegation contained therein
20 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
21 as to the truth of all remaining allegations, and therefore denies them.

22 **Eight Cause of Action (Against Defendants ETC, TNI, and VBD) [Alleged] Civil**
23 **Conspiracy**

24 159. In response to Paragraph 159, VBD incorporates by reference its
25 responses to the proceeding paragraphs of the SAC as though fully restated herein.

26 160. VBD denies each and every allegation contained in Paragraph 160.

27 161. VBD denies each and every allegation contained in Paragraph 161.

1 162. Paragraph 162 VBD denies each and every allegation contained therein
2 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
3 as to the truth of all remaining allegations, and therefore denies them.

4 163. Paragraph 163 VBD denies each and every allegation contained therein
5 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
6 as to the truth of all remaining allegations, and therefore denies them.

7 164. Paragraph 164 VBD denies each and every allegation contained therein
8 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
9 as to the truth of all remaining allegations, and therefore denies them.

10 165. Paragraph 166 VBD denies each and every allegation contained therein
11 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
12 as to the truth of all remaining allegations, and therefore denies them.

13 166. Paragraph 166 VBD denies each and every allegation contained therein
14 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
15 as to the truth of all remaining allegations, and therefore denies them.

Ninth Cause of Action (All Defendants) Breach of Contract

17 167. In response to Paragraph 167, VBD incorporates by reference its
18 responses to the proceeding paragraphs of the SAC as though fully restated herein.

19 168. Paragraph 168 VBD denies each and every allegation contained therein
20 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
21 as to the truth of all remaining allegations, and therefore denies them.

22 169. Paragraph 169 VBD denies each and every allegation contained therein
23 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
24 as to the truth of all remaining allegations, and therefore denies them.

25 170. Paragraph 170 VBD denies each and every allegation contained therein
26 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
27 as to the truth of all remaining allegations, and therefore denies them.

1 171. Paragraph 171 VBD denies each and every allegation contained therein
2 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
3 as to the truth of all remaining allegations, and therefore denies them.

4 172. Paragraph 172 VBD denies each and every allegation contained therein
5 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
6 as to the truth of all remaining allegations, and therefore denies them.

7 173. Paragraph 173 VBD denies each and every allegation contained therein
8 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
9 as to the truth of all remaining allegations, and therefore denies them.

10 174. Paragraph 174 VBD denies each and every allegation contained therein
11 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
12 as to the truth of all remaining allegations, and therefore denies them.

13 175. Paragraph 175 VBD denies each and every allegation contained therein
14 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
15 as to the truth of all remaining allegations, and therefore denies them.

16 176. Paragraph 176 VBD denies each and every allegation contained therein
17 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
18 as to the truth of all remaining allegations, and therefore denies them.

19 177. Paragraph 177 VBD denies each and every allegation contained therein
20 as it pertains to Defendant VBD. VBD lacks information sufficient to form a belief
21 as to the truth of all remaining allegations, and therefore denies them.

Prayer For Relief

24 These paragraphs set forth the state of relief requested by Plaintiff to which no
25 response is required. Defendant VBD denies that Plaintiff is entitled to any of the
26 requested relief and denies any allegations contained in the Prayer For Relief to
27 which a response is required.

1 Defendant VBD denies each and every allegation of Plaintiff's SAC not
2 specifically admitted or otherwise responded to above. VBD specifically denies that
3 it has infringed or is liable for infringement of any valid and enforceable trademarks
4 of Plaintiffs. VBD further denies that it has infringed or is liable for infringement of
5 any valid and enforceable copyrights or copyright rights of Plaintiff. VBD further
6 specifically denies that Plaintiff is entitled to any relief whatsoever of any kind
7 against VBD as a result of any act of VBD or any person or entity acting on behalf of
8 VBD.

9

10 **AFFIRMATIVE DEFENSES**

11

12 **FIRST AFFIRMATIVE DEFENSE**

13

(Facts Insufficient to State Any Cause of Action)

14

15 1. The Complaint as a whole, and each purported cause of action alleged therein,
16 fails to state facts sufficient to constitute any cause of action against Defendant
upon which relief may be granted.

17

SECOND AFFIRMATIVE DEFENSE

18

(Statute of Limitations)

19

20 2 . The Complaint as a whole, and each purported cause of action alleged and
remedy sought therein, is barred in whole or in part by the applicable statute of
21 limitations, including but not limited to 15 U.S. Code § 4504.

22

23

THIRD AFFIRMATIVE DEFENSE

24

(Lack of Standing)

25

26 3. Plaintiff's Complaint, and each purported cause of action and/or form of
recovery therein, is barred to the extent that Plaintiff lacks standing to assert any of
27 the causes of action and/or form of recovery contained in the Complaint because

28

1 Plaintiff has not suffered any injury-in-fact or for which Plaintiff does not have a
2 private right of action.

3

4 **FOURTH AFFIRMATIVE DEFENSE**

5 (Waiver)

6 4. The Complaint, and each purported cause of action alleged therein, is barred
7 on the ground that Plaintiff has expressly and/or impliedly waived the right to assert
8 such causes of action by virtue of their verbal and expressions or conduct.

9

10 **FIFTH AFFIRMATIVE DEFENSE**

11 (Estoppel)

12 5. By virtue of her conduct, Plaintiff must be estopped from asserting any of
13 thecauses of action in the Complaint against Defendants.

14

15 **SIXTH AFFIRMATIVE DEFENSE**

16 (Laches)

17 6. Plaintiff is barred from proceeding with this action on the ground that
18 Plaintiff is guilty of laches in failing to timely commence this action, which has
19 prejudiced Defendants in its ability to discover adequate witnesses, testimony, facts,
20 and evidence to support Defendant's defenses.

21

22 **SEVENTH AFFIRMATIVE DEFENSE**

23 (Unclean Hands)

24 7. Defendants is informed and believes and thereon alleges that Plaintiff, by
25 their own conduct, is guilty of unclean hands, which completely bars or reduces
26 recovery, if any, to which she may be entitled, all in accordance with proof at trial.

27

28 **EIGHTH AFFIRMATIVE DEFENSE**

1 (Consent)

2 8. The Complaint, and each purported cause of action alleged therein, is barred
3 on the ground that at all times alleged in the Complaint, Plaintiff expressly or
4 impliedly assented to, ratified, or concurred with the conduct alleged to be unlawful.

5 **NINTH AFFIRMATIVE DEFENSE**

6 (Failure to Exhaust Administrative Remedies)

7 9. Plaintiff failed to exhaust available administrative remedies and is therefore
8 precluded from obtaining any relief under the alleged causes of action in the
9 complaint.

10 **TENTH AFFIRMATIVE DEFENSE**

11 (Federal and/or State Preemption)

12 10. Plaintiff's Complaint, and each claim contained therein, is barred to the
13 extent that Plaintiff's claims are preempted by federal and/or state law.

14

15 **ELEVENTH AFFIRMATIVE DEFENSE**

16 (Good Faith)

17 11. All actions taken by Defendants with respect to Plaintiff, at all times
18 relevant to this action, were taken in good faith for legitimate reasons.

19

20 **TWELFTH AFFIRMATIVE DEFENSE**

21 (Unconstitutional)

22 12. Plaintiff's cause of action for penalties is barred because it is
23 unconstitutionally vague and overbroad as applied to the facts and circumstances of
24 this case.

25 **THIRTEENTH AFFIRMATIVE DEFENSE**

26 (Offset)

1 13. Defendants alleges that it has suffered damages by reason of Plaintiff's
2 conduct, and Defendants has a right to offset its damages against the damages, if any,
3 of Plaintiff.

FOURTEENTH AFFIRMATIVE DEFENSE

(Failure to Mitigate)

6 14. Without admitting any facts pled by Plaintiff, Defendants alleges that if
7 Plaintiff sustained any loss, injury or damages either as alleged in the Complaint or at
8 all, which Defendants expressly denies, the same were directly and proximately
9 caused and/or exacerbated by Plaintiff's own conduct, promises and representations
10 to Defendants, and failure to take actions to mitigate these losses, injuries, or
11 damages.

FIFTEENTH AFFIRMATIVE DEFENSE

(Speculative Damages and/or Penalties)

14 15. Plaintiff is precluded from recovering the damages alleged in the
15 Complaint because those damages and/or penalties are too vague, ambiguous,
16 excessive, unreasonable, uncertain and speculative to permit recovery.

SIXTEENTH AFFIRMATIVE DEFENSE

(No Punitive Damages)

20 16. Defendants alleges that Plaintiff is not entitled to recover the punitive
21 damages in her Complaint as an award of punitive damages would violate
22 Defendant's rights under the Constitution of the United States of America, including
23 Defendant's rights to (1) procedural due process under the Fourteenth Amendment of
24 the United States Constitution; (2) protection for "excessive fines" as provided in the
25 Eighth Amendment of the United States Constitution and Article I; and (3)
26 substantive due process provided in the Fifth and Fourteenth Amendments of the
27 United States of America

1 **SEVENTEENTH AFFIRMATIVE DEFENSE**

2 (Release)

3 17. The Complaint, and each purported cause of action alleged therein, is
4 barred on the ground that Plaintiff released and waived any and all claims they may
5 have against Defendant.

6 **EIGHTEENTH AFFIRMATIVE DEFENSE**

7 (Business Necessity)

8 18. Any recovery on Plaintiff's Complaint is barred on the ground that every
9 action taken with respect to Plaintiff was done out of business necessity.

10 **NINETEEH AFFIRMATIVE DEFENSE**

11 (No Copyright Infringement)

12 19. VBD has not infringed, does not infringe (either directly or indirectly),
13 and is not liable for infringement of any valid copyright or copyright rights of
14 Plaintiff, including, without limitation, any copyright rights in the works that are the
15 subject of the Asserted Copyrights.

16 **TWENTIETH AFFIRMATIVE DEFENSE**

17 (Elements Not Protect by Copyright)

18 20. Plaintiff's copyright claims are barred to the extent that Plaintiff claims
19 rights to elements of Plaintiff's software or other works that are functional, are not
20 original, or are otherwise not protectable by copyright and/or are not protected by the
21 Asserted Copyrights.

22 **TWENTY FIRST AFFIRMATIVE DEFENSE**

23 (Fair Use)

24 21. Plaintiff's claims for copyright and trademark infringement are barred
25 by the doctrine of fair use pursuant to 17 U.S.C. § 107 in view of the nature of the
26 works asserted by Plaintiff and covered by the Asserted Copyrights and Trademarks,
27 the amount (if any) and substantiality of the portions of such works used by VBD in

1 relation to the works as a whole, the purpose and character of any use thereof made
2 by VBD, and the effect, if any, of such use on the potential market for the works.

3 **TWENTY SECOND AFFIRMATIVE DEFENSE**

4 (De Minimis Copying)

5 22. Plaintiff's claims for copyright infringement are barred by the doctrine
6 of de minimis copying, as any protectable portions of the works that are the subject of
7 the Asserted Copyrights used by VBD have been de minimis.

8 **TWENTY THIRD AFFIRMATIVE DEFENSE**

9 (No Intent to Induce Copyright Infringement)

10 23. VBD has not engaged in purposeful, culpable expression or conduct
11 designed or intended to result in others infringing Plaintiff's Asserted Copyrights and
12 thus is not liable under Plaintiff's inducement claims.

13 **TWENTY FOURTH AFFIRMATIVE DEFENSE**

14 (Third Party Liability)

15 24. Any use in the Plaintiff's works of any protected elements of the works
16 that are the subject of the Asserted Copyrights was made by third parties without the
17 knowledge of VBD, and VBD is not liable for such use.

18 **TWENTY FIFTH AFFIRMATIVE DEFENSE**

19 25. Upon information and belief, statements and actions of Plaintiff were
20 such that it was reasonable to infer that users of the VBD works, including, without
21 limitation, manufacturers and software developers, had permission to use the
22 Asserted Copyrights.

23 **TWENTY SIXTH AFFIRMATIVE DEFENSE**

24 (No Injunctive Relief)

25 26. Plaintiff is not entitled to injunctive relief because any alleged injury to
26 Plaintiff there is none, neither immediate nor irreparable and Plaintiff has an adequate
27 remedy at law.

TWENTY SEVENTH AFFIRMATIVE DEFENSE
(Section 230)

3 27. Plaintiff has failed to state a claim against Event Tickets because “[n]o
4 provider or user of an interactive computer service shall be treated as the publisher or
5 speaker of any information provided by another information content provider.” 47
6 U.S.C. § 230.

RESERVATION OF RIGHTS

8 28. Defendants reserves the right to amend or add any additional defenses or
9 counterclaims which may become known during the course of discovery.

11 | **WHEREFORE**, Defendants prays as follows:

- 12 1. That Plaintiff takes nothing by way of its Complaint;

13 2. A judgment dismissing Plaintiff's Amended Complaint;

14 3. That Defendants recover attorneys' fees, expert fees and investigator fees;

15 4. That Defendants recover costs of suit herein; and

16 5. That the Court award such other and further relief as it deems appropriate.

Respectfully submitted,

20 | Dated: January 30, 2025

COHEN IP LAW GROUP P.C.

By: /s/ Michael N. Cohen
Michael N. Cohen
Vikram Amritraj

*Attorneys for Defendant
Virtual Barcode Distribution LLC*

DEMAND FOR A JURY TRIAL

2 Pursuant to Fed. R. Civ. P. 38, Defendant demands a jury trial on all claims
3 which are triable to a jury in this action.

Respectfully submitted,

6 | Dated: January 30, 2025

COHEN IP LAW GROUP P.C.

By: /s/ Michael N. Cohen
Michael N. Cohen
Vikram Amritraj

*Attorneys for Defendant
Virtual Barcode Distribution LLC*